

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

ROBERT STOUD,	:	
	:	
Plaintiff	:	CIVIL ACTION - LAW
	:	
v.	:	
	:	
SUSQUEHANNA COUNTY,	:	NO. 3:17-CV-2183-MEM
	:	
Defendant	:	

MOTION IN LIMINE OF DEFENDANTS TO PRECLUDE PLAINTIFF'S
CLAIM FOR LOSS OF FUTURE EARNINGS

Defendant, Susquehanna County, through its attorneys, Kreder Brooks
Hailstone LLP, hereby make the following Motion in Limine:

1. Plaintiff should be precluded from advancing a claim at trial for loss of future earnings.
2. Plaintiff has not presented evidence in support of a claim for loss of future earnings.
3. Additionally, no expert testimony has been offered on the subject, as

required for calculation of projected earnings and reduction to present value.

4. In the event Plaintiff is allowed to provide future earnings testimony, Plaintiff should not be allowed to speculate or testify to any wage loss issues that are of a “specialized or technical nature” and that are not within his personal knowledge.

WHEREFORE, Defendant, Susquehanna County, respectfully request the Court to issue an Order precluding Plaintiff from advancing a claim at trial for loss of future earnings.

Respectfully submitted,

KREDER BROOKS HAILSTONE LLP

220 Penn Avenue, Suite 200
Scranton, PA 18503
(570) 346-7922

By /s/ A. James Hailstone
A. James Hailstone
Attorney I.D. #80055

CERTIFICATE OF SERVICE

AND NOW, this 21st day of August, 2020, A. James Hailstone, a member of the firm of Kreder Brooks Hailstone LLP, electronically filed the foregoing Motion in Limine with the Clerk of the United States District Court for the Middle District of Pennsylvania using the CM/ECF system which sent notification of such filing to the following Filing Users at the following e-mail address(es):

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ATTORNEYS FOR PLAINTIFF

/s/ A. James Hailstone

A. James Hailstone

Attorney I.D. #80055

Attorneys for Defendant